To: Albright, David[Albright.David@epa.gov]

From: Dermer, Michele

**Sent:** Thur 8/6/2015 3:31:08 PM

Subject: RE: Discussion outline for call with Peter

Looks great David.

From: Albright, David

Sent: Thursday, August 06, 2015 8:27 AM

To: Montgomery, Michael

Cc: Dermer, Michele; McWhirter, Lisa

Subject: Discussion outline for call with Peter

Appended below and attached is a proposed outline for our discussion with Peter (note that this only covers the CA UIC program; I see from the invitation that "tribal DW" is also included and I am assuming that means an update on tribal drought issues, but please confirm). Thanks, David

## **CA UIC Program**

- \* July 15th State Submittal
  - Preliminary assessment of 11 aquifers (HTAE)
- 1) 1 of the 11 may not be USDW; most or all of the others may not meet AE criteria
  - 2) 5 of the 11 have no active injection
- 3) State expects at least 1 operator in the 11 to come forward with data/AE request
- No requests for AEs for disposal wells injecting into sub-3,000 ppm TDs aquifers (7/15/15 target date for state submittal)
  - 1) Disposal wells into sub-3,000 aquifers required to shut down 10/15/15
  - 2) State is reviewing one package; likely public notice starting in August

(Arroyo Grande)

- Proposed plan and schedule for comprehensive Class II program improvements

- Outline of proposed public participation in State's AE process

- EPA reply letter

1) Timing of final determinations by state of 11 aquifers HTAE (11/15/15

target)

2) With no AE submittals, all Cat 1 wells in sub-3,000 aquifers (~50-60??) will cease injection by 10/15/15 per state's regulations

\* July 31st State Submittal

- Initial review of 5,675 Category 2 wells (EOR wells)

1) EOR well breakdown (85% cyclic steam; 12% steam flood; 3% other)

2) For thermal enhanced recovery wells (97% of Cat 2) – no further analysis

3) 24 Cat 2 wells still under review; State may/will issue information orders and take action as needed

4) EPA response to July 31st submittal

\* Other Key Items

- State's emergency/permanent regulations

- Category 1 well evaluations

- Class I injection wells

- Congressional and 3<sup>rd</sup> party interests/calls

- Upcoming dates/milestones

August 21, 2015: EPA/SB meeting on Class I wells

October 15, 2015: Shut-in of Cat 1 wells in sub-3,000 ppm TDS

aquifers if no AE

November 15, 2015: Target for 90% of Cat 1 AE requests, 100% of

determinations for the 11 aquifers HTAE

February 15, 2016: Target for 90% of Cat 2 AE requests

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